1	1 Vanessa R. Waldref	
2	United States Attorney	
	Eastern District of Washington	
3		
4	4 Assistant United States Attorney 402 E. Yakima Ave., Suite 210	
5		
6	6 Telephone: (509) 454-4425	
7	UNITED STATES DISTRICT COURT	
8	8 EASTERN DISTRICT OF WASHINGTON	
9	9	
10	UNITED STATES OF AMERICA,) NO: 1:24-0	CR-2006-SAB-1
11	11	
12	Plaintiff,) GOVERNM	IENT'S
13	VS	
14	14) MEMORAN	NDUM
15	CHARMMORRO VIJAY STROTHERS,)	
16	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	
17	17	
18	18 DI : (:CC II : (1 C) () C A : 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	D W 11 C
19	Plaintiff, United States of America, by and through Vaness	sa K. Waldrei,
20	United States Attorney for the Eastern District of Washington, and Benjamin D.	
21	Seal, Assistant United States Attorney, submits the following Sentencing	
22		
23	Memorandum.	
24	I. <u>Sentencing Recommendation</u>	
25	25	n
26	The Government recommends a sentence of 30 months. T	nis is a sentence
27	at the high end of the guideline range.	
28	28	

Government's Sentencing Memo.

The Government believes that a 30 month sentence is appropriate because Defendant's fraud involved impersonating a police officer and threatening the victims with jail if they did not comply with his demands. Respectfully submitted this 30th day of July 2024. Vanessa R. Waldref United States Attorney <u>s/Benjamin D. Seal</u> Benjamin D. Seal Assistant United States Attorney

CERTIFICATE OF SERVICE I hereby certify that on July 30, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF which will send notification of such filing to all counsel of record. s/Benjamin D. Seal Benjamin D. Seal Assistant United States Attorney United States Attorney's Office 402 E. Yakima Ave., Suite 210 Yakima, WA 98901 (509) 454-4425